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BORDEN INC  
180 EAST BROAD STREET - COLUMBUS, OHIO 43215  
CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

RECEIVED  
EPA REGION VI

1985 APR 16 AM 11:36

SUPERFUND BRANCH

April 12, 1985

LAW DEPARTMENT

Ms. Amy Layne  
Superfund Compliance (6AW-SC)  
U.S. Environmental Protection Agency  
1201 Elm Street  
Dallas, TX 75270

LAD980749899  
MONOCHEM LDR #1

Re: Prairieville School Bus Turn Around (LA 03778)  
Prairieville, Louisiana

LA00639  
LA9026

Dear Ms. Layne:

The letter of March 21, 1985 from Allyn M. Davis, of EPA, to Borden's General Counsel was referred to me for reply.

I have been in touch with personnel at the Borden facility in Geismar, Louisiana. They, in turn, have discussed the matter with William B. DeVille of the Louisiana Department of Environmental Quality. Mr. DeVille advises that the belief that Borden, Inc. and/or Monochem, Inc. disposed of materials at this site comes from oral testimony of an individual who remembered a truck bringing drums to the site around 1970 and who believed that these drums came from either Borden or Monochem. The personnel at our Geismar, Louisiana facility have also reviewed the volatile organic analysis of a sample No. 077-350305-03-0 taken from the Prairieville location. The chemicals found in the sample appear to be similar to those which might be associated with an ethylene-based chlorinated hydrocarbon facility. The wastes do not appear to be associated with materials from an acetylene-based unit.

Until mid-1976, vinyl chloride at the Geismar site was manufactured by Monochem, Inc. using an acetylene-based process. Although Borden now operates an ethylene-based VCM process, it did not come onstream until the last half of 1976. Therefore, we do not believe that a truck hauling drums of waste material from an ethylene-based chlorinated hydrocarbon facility to the Prairieville site in 1970 would have come from Borden or Monochem.

TELEPHONE 614/225-4000

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Ms. Amy Layne  
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In response to the specific questions set forth on page 2 of the March 21 letter, at this time we do not believe that Borden or Monochem disposed of or arranged for disposal of any substances at the site, and therefore, cannot give you any specific volumes, identification of substances or description of arrangements made to transport such wastes. Moreover, since we do not have information indicating that we sent waste to the site, we did not submit a notification of hazardous waste disposal pursuant to Section 103(c) of CERCLA. Finally, we have not uncovered any other documentation which relates to shipments to the Prairieville site.

Very truly yours,

Harvey A. Rosenzweig

HAR:mmm

cc: Mr. William B. DeVille  
Administrator, Inactive and  
Abandoned Sites Division  
Louisiana Department of Environ-  
mental Quality